Response from: **Andrew Whitfield**
Responding on behalf of: **Self**

I am concerned that by allowing VoIP / VoB services to be offered that do not include features already available (999, 118, etc.) within fixed line and mobile services you, as the regulator, will be forcing the customer to take two services at least in the interim penalising the early adopter.

There does not seem to have been any thought to the number of services required to be purchased to facilitate this purchase and the underlying charges that may be incurred by using the service. Firstly there is the delivery platform (access) such as the Local Loop, then a data service from an ISP. Each of these services could be charged not only as a standing charge but include data volume charges. Volume charges include the protocol overheads and my simple 8K voice becomes 48K (and if ATM overheads are added in much more) taking into account both directions, then one must consider the recipient of the call and what they are charged for access. As a recipient I'm now paying for part of the call that I did not pay for before (the data volume charge if I have one). Now add in any call connection and duration charges. This is going to make it very difficult for the average consumer to compare pricing of a simple voice call.

As can be seen in the high street in any mobile phone shop there are so many tariffs from only 5 networks. I am sure the networks don't employ very cleaver and expensive product managers with the intent of saving the customer money so why all the choice. The potential for confusing tariffs is far greater with Internet calls, there are likely to be far more providers due to the low entry cost (no network to build).

The customer could end up actually paying more, maybe spread over 2 or 3 providers of different services. Will the regulator make the call supplier charge for delivering the call including any infrastructure charge and distribute costs to the infrastructure supplier/s. How will the charging structure be simplified.

I don't think it has been made clear just how unreliable these services could be, we are not only talking about power at the end user customer going off. There are much more threatening things than downloading a file over your own local end, what is the regulator doing about hackers attacking the Internet to the point where it almost stops. What will be done to ensure hackers can't access and monitor calls. What will be done to ensure hackers can't access the VoIP hardware (if there is any) and use it to generate calls. What if a hacker generates calls to a premium rate number, who will be responsible for any costs caused.

While on the subject of reliability just how small will a company supplying new voice switching services be allowed to be, are we talking about someone with a PC in their back bedroom on a dial up connection (because it's technically

possible). Will the regulator specify redundant power supplies / data backup / redundant servers what sort of quality will the regulator ensure for the customer.

I'm really concerned you will allow ISP's and others to carry this data without protecting it against unauthorised access (that's authorised by the end user and not anyone else, including government). So what is proposed to protect the data content.

I am a potential customer currently using Broadband (ADSL), fixed line and mobile (2G) voice.

You can publish my response including my name if you feel it is worthwhile, however I request you withhold my contact details and this paragraph.

Best Regards

Andrew Whitfield